

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO SAVERIN,
DUSTIN MOSKOVITZ, ANDREW MCCOLLUM,
CHRISTOPHER HUGHES, and FACEBOOK,
INC.,

Defendants.

CIVIL ACTION NO. 1:04-cv-11923
(DPW)

District Judge Douglas P.
Woodlock

Magistrate Judge Robert B.
Collings

MARK ZUCKERBERG and
FACEBOOK, INC.,

Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER
WINKLEVOSS, and DIVYA NARENDRA,

Additional Counterdefendants.

**PLAINTIFF'S RESPONSE TO DEFENDANTS' NOTICE OF PENDING MOTIONS
AND SUGGESTION FOR CONSOLIDATING ORAL ARGUMENT ON ALL PENDING
MOTIONS BEFORE THE HONORABLE MAGISTRATE JUDGE COLLINGS**

Plaintiff ConnectU LLC hereby responds to Defendants' Notice (Docket No. 112)
filed November 14, 2005.

Defendants' Notice is essentially a request to postpone the November 18, 2005
hearing on Plaintiff's Motion to Compel the Production of Mirror Images of Defendants'

Hard Drives and Other Electronic Memory Devices, and Documents Created After May 21, 2004. Plaintiff does not wish to postpone such hearing, and therefore opposes Defendants' request. Plaintiff also opposes Defendants' suggestion that the Court hear an additional seven motions on such short notice to the Court and counsel, and because Plaintiff assumes the Court will schedule oral argument on the other pending motions if and when it wishes to do so.

However, in light of the rapidly approaching close of fact and expert discovery, Plaintiff joins Defendants' request that the Court consider the parties' **Joint** Motion to Modify the Court's March 29, 2005 Scheduling Order (Docket No. 105) at the November 18, 2005 hearing. The Joint Motion asks the Court to vacate the current Scheduling Order and set new deadlines after all the pending motions are resolved.

DATED: November 15, 2005

/s/ Troy E. Grabow

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